

REMARKS/ARGUMENTS

Reconsideration of the rejections set forth in the Office Action dated October 16, 2003 is respectfully requested. Claims 1-15, 18-28, and 48-56 have been allowed. Claims 32-34 and 39-41 have been objected to. Claims 31, 35-38, and 42-44 have been rejected. Claims 16, 17, 29, 30, 46, 47, 57, and 58, which were previously withdrawn, have been canceled. As such, claims 1-15, 18-28, 31-45, and 48-56 are currently pending.

The Applicant notes that the disposition of claim 45 is unknown. The Examiner has not specified whether claim 45 is rejected, allowed, or objected to. As such, the Applicants are unable to specifically address claim 45 except to state that claim 45 is currently pending.

Allowable Subject Matter

Claims 1-15, 18-28, and 48-56 have been allowed.

Claims 32-34 and 39-41 have been objected to as being dependent upon a rejected base claim. However, the Examiner has stated that claims 32-34 and 39-41 would be allowable if rewritten in independent form to include all of the limitations of the associated base claim and any intervening claims. Since the Applicant believes that independent claim 31 is allowable, the Applicant has chosen not to rewrite claims 32-34 and 39-41 in independent form at this time.

Rejections under 35 U.S.C. § 102

Claims 31, 35-38 and 42-44 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Bisschops et al. (U.S. Patent No. 6,421,112).

Independent claim 31 recites a scanning stage apparatus which includes a first actuator arrangement that is arranged to drive a first plate and a second plate along a first axis, as well as a

second actuator arrangement that is arranged to drive the first plate and the second plate along a second axis. Claim 31 also requires that driving the first plate and the second plate along the first axis drives a rod along the first axis, and that driving the first plate and the second plate along the second axis drives the rod along the second axis.

The Examiner has argued that Bisschops et al. teach the apparatus of claim 31. The Applicant respectfully submits that while Bisschops et al. appear to teach of a first actuator arrangement and a second actuator arrangement, Bisschops et al. do not appear to teach that a first actuator arrangement drives plates along a first axis while a second actuator arrangement drives plates along a second axis. Bisschops et al. also do not appear to teach that a rod is driven along two axes by plates.

In the Office Action dated October 16, 2003, the Examiner has equated a linear motor 34 (as shown in Figs. 2A and 2B of Bisschops et al.) to the first actuator arrangement of claim 31, and Y1 and Y2 drives (also as shown in Figs. 2A and 2B of Bisschops et al.) to the second actuator arrangement of claim 31. While Y1 and Y2 drives appear to drive sliders 32 (which the Examiner equated to the first and second plates of claim 31) along a Y-axis, as discussed at column 6, lines 45-48 of Bisschops et al., the sliders do not appear to be driven in any other direction. Linear motor 34 is an X-direction linear motor (Bisschops et al., column 6, lines 54-55) which does not appear to drive sliders 32 in any direction. In addition, sliders 32 do not appear to move in an X-direction. The sliders 32, which the Examiner compares to the plates of claim 31, are only driven along one axis and further, are only driven by one actuator arrangement. Hence, the Applicant submits that sliders 32 of Bisschops et al. are not driven along a first axis by a first actuator arrangement and along a second axis by a second actuator arrangement. Accordingly, claim 31 and its dependents are believed to be allowable over Bisschops et al. for at least this reason.

Further, Bisschops et al. teach that Y1 and Y2 drive sliders 32, and also teach that tube 31 is directly driven by linear motor 34 (Bisschops et al., column 6, lines 42-49). Since Bisschops et al. teach that a tube (rod) is driven directly by a linear motor (first actuator arrangement), and

claim 31 requires that a rod is driven by a first plate and a second plate which are driven by a first actuator arrangement, claim 31 and its dependents are also believed to be allowable over Bisschops et al. for this additional reason.

Conclusion

In view of the above, the Applicant believes that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below. If any fees are due in connection with the filing of this amendment, the Commissioner is authorized to charge such fees to Deposit Account 50-1652 (Order No. NRCAP004).

Respectfully submitted,



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